

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

JASON YOAKAM,

Plaintiff,

v.

CASE NO. 3:21cv31

VIRGINIA DEPARTMENT OF
CORRECTIONS, *et al.*,

Defendants.

STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff and Defendants hereby file this joint stipulation of dismissal with prejudice, with each party bearing their own fees and costs.

Pursuant to *Kokkonen v. Guardian Life Insurance of America*, 511 U.S. 375 (1994), this Stipulation explicitly reserves jurisdiction in this Court to enforce the terms of the settlement agreement for a period of three months from the date of the execution of this Stipulation of Dismissal.

Dated: January 14, 2022

Respectfully submitted,

s/ Richard Saenz

Richard Saenz

Lambda Legal

120 Wall St., 19th Fl.

New York, NY 10005

Telephone: 212-809-8585

Email: rsaenz@lambdalegal.org

Counsel for Plaintiff

s/ Laura Maughan

Laura Maughan (VSB No. 87798)

Assistant Attorney General

Office of the Attorney General

Criminal Justice & Public Safety Division

202 North Ninth Street

Richmond, Virginia 23219

Telephone: (804) 786-0030

Fax: (804) 786-4239

lmaughan@oag.state.va.us

*Counsel for Defendants Virginia Department of
Corrections, Harold W. Clarke, A. David Robinson,
Mariea LeFevers, Meredith Cary-Morrisette, Steve
Herrick, Julie Fink, Morgan Gesiert-Klein, Wayne
Reed, and Paul Targonski*

CERTIFICATE OF SERVICE

I electronically filed the forgoing document with the clerk of court for the United States District Court for the Western District of Virginia on January 14, 2022, using the CM/ECF system, which will send notification of such filing to all CM/ECF registered attorneys on the NEF.

s/ Laura Maughan
Laura Maughan (VSB No. 87798)
Assistant Attorney General